

IN RE:)
BERNARD R. BUSCHER) Chapter 13
TAMMY JO BUSCHER) Case No. 307-07328
6478 LICKTON PIKE) Judge Marian Harrison
GOODLETTSVILLE, TN 37072)
SSN: XXX-XX-9704)
SSN: XXX-XX-0701)
Debtor(s).)
BERNARD BUSCHER and TAMMY JO)
BUSCHER,)
vs)
SOUTHEAST FINANCIAL FEDERAL)
CREDIT UNION.)

Comes the plaintiffs, Bernard and Tammy Buscher, through counsel and would move for expedited turnover pursuant to 11 U.S.C. § 542, Bankruptcy Rule 7001 and Bankruptcy Local Rule 7001 and would state as follows:

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5. Southeast Financial Federal Credit Union is aware of the Chapter 13 as of October 7th , 2007 and refuses to release the property of the estate.

6. The vehicle is necessary for the effective reorganization of this estate.

7. Continued possession of this property is a violation of the Automatic Stay provided by 11 U.S.C. § 362.

9. The Debtors have made provision of adequate protection of the creditor's security interest in their proposed plan.

WHEREFORE, PREMISES CONSIDERED, the Debtors move:

1. That this matter be set on an expedited basis
2. That this Court order turnover of the 1997 Jeep Wrangler to the debtors.
3. For general relief.

Respectfully submitted,

/s/ Kevin S. Key
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CERTIFICATE OF SERVICE

I certify I mailed/e-mailed a copy of the foregoing to John E. Simmonds, Registered Agent for Southeast Financial Federal Credit Union, 444 James Robertson Parkway, Nashville, TN 37219, the Chapter 13 Trustee, P.O. Box 190664, Nashville, TN 37219-0664 and the U.S. Trustee, 318 Customs House, 701 Broadway, Nashville, TN 37203, on this _____ day of October, 2007.

/s/ Kevin S. Key
KEVIN S. KEY #9519